UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:

Chemical Solvents, Inc.
3751 Jennings Road
Cleveland, Ohio 44109

ATTENTION:

Jerry Schill, Vice President of Operations
Anthony Datillo, EnviroMatrix

Request to Provide Information Pursuant to the Clean Air Act

The United States Environmental Protection Agency (EPA) is requiring Chemical Solvents, Inc. (CSI or you) to submit certain information and conduct emissions testing at its Denison Avenue and Jennings Road off-site waste management facility in Cleveland, Ohio (plant site). Appendix B, Appendix C, and Appendix D specify the information that you must submit. You must send this information to us according to the schedules outlined in Appendix B and Appendix C.

EPA is issuing this information request under section 114(a) of the Clean Air Act (the Act), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

CSI owns and operates the plant site, which includes emission sources. EPA is requesting this information to determine whether the emission sources located at the plant site are complying with the Clean Air Act.

You must send all required information to:

Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency - Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Under 40 C.F.R. Part 2, Subpart B, you may assert a claim of business confidentiality for any portion of the submitted information. You must specify the page, paragraph, and sentence when identifying the information subject to your claim. Appendix A specifies the assertion and substantiation requirements for business confidentiality claims.

CSI must submit all requested information under an authorized signature with the following certification:

> I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to section 113(c)(2) of the Act, and 18 U.S.C. §§ 1001 and 1341.

EPA may use any information submitted in response to this request in an administrative, civil, or criminal action.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation. To aid in our electronic record keeping efforts, please provide your response to this request for information without staples. Paper clips, binder clips, and 3-ring binders are acceptable.

Failure to comply fully with this request for information may subject CSI to an enforcement action under section 113 of the Act, 42 U.S.C. § 7413.

You should direct any questions about this request for information to Katharina Bellairs at (312) 353-1669.

7/16/13
Date

George T. Czerniak
Director
Air and Radiation Division

Appendix A

Confidential Business Information (CBI)
Assertion and Substantiation Requirements

A. Assertion Requirements

You may assert a business confidentiality claim covering all or part of the information requested in the attached letter, as provided in 40 C.F.R. § 2.203(b). To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document over which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a legend to indicate the intent to claim confidentiality. The stamped or typed legend, or other suitable form of notice, should employ language such as "trade secret" or "proprietary" or "company confidential" and indicate a date if any when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by the U.S. Environmental Protection Agency only to the extent permitted and by means of the procedures set forth by Section 114(c) of the Clean Air Act (the Act), and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the attached letter as a waiver of that claim, and the information may be made available to the public without further notice to you.

Please segregate personnel, medical and similar files from your responses and include that information on separate sheet(s) marked as "Personal Privacy Information" given that disclosure of such information to the general public may constitute an invasion of privacy.

B. Substantiation Requirements

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208 which provides in part that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; and that the information is not and has not been reasonably obtainable by legitimate means without your consent.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking you to substantiate fully your CBI claim. If you receive such a letter, you must provide EPA with a response within the number of days set forth in the EPA request letter. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential. **You must be specific by page, paragraph, and sentence when identifying the information subject to your claim.** Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being subject to CBI, you must answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.

2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question #1?

3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?

4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?

5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.

6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.

8. Any other issue you deem relevant.

Please note that emission data provided under Section 114 of the Act, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2. "Emission data" means, with reference to any source of emission of any substance into the air:

> Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;
>
> Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including, to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and
>
> A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. §§ 2.301(a)(2)(i)(A), (B) and (C).

Emission data includes, but is not limited to, service records stating the amount of refrigerant added to a unit or reclaimed from a unit.

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by, and by means of the procedures set forth in, 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Appendix B

When providing the information requested in Appendix C, use the following instructions and definitions.

INSTRUCTIONS

1. Provide a separate narrative response to each question and subpart of a question set forth in the Information Request.

2. Precede each answer with the number of the question and subpart to which it corresponds and at the end of each answer identify the person(s) that provided information that was used or considered in responding to that question, as well as each person that was consulted in the preparation of that response.

3. Indicate on each document produced in response to this Information Request, or in some other reasonable manner, the number of the question and subpart to which it corresponds.

4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.

5. Where documents or information necessary for a response are neither in your possession nor available to you, indicate in your response why such documents or information are not available or in your possession and identify any source that either possesses or is likely to possess such information.

6. Whenever possible, provide responses in electronic (PDF) format.

DEFINITIONS

All terms used in this Request for Information will have their ordinary meaning unless such terms are defined in the Act, 42 U.S.C. §§ 7401 et. seq., 40 C.F.R. Part 52 (which incorporates the federally-approved State Implementation Plan (SIP)), or other Clean Air Act implementing regulations. Reference is made to the EPA regulatory provisions only; however, you should apply the applicable provisions of the federally-approved SIP when appropriate. Definitional clarification is specified below.

1. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation

and support. All documents in hard copy should also include attachments to or enclosures with any document.

2. The terms "relate to" or "pertain to" (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.

3. The term "CSI" shall mean Chemical Solvents. Inc and all subsidiaries and related entities.

4. The term "plant site" shall mean properties owned and operated by CSI located at 3751 Jennings Road and 1010 Old Denison Avenue, Cleveland, Ohio 44109.

5. The term "VRS" shall mean vapor recovery system.

6. The terms "J001" and "J002" shall mean the solvent loading rack at Denison with a VRS and the solvent loading rack at Jennings with a VRS, respectively, as listed in Condition C.1. of the Federally Enforceable Permit to Install and Operate, P0094783, the Ohio Environmental Protection Agency issued to CSI on August 16, 2011.

7. The terms "P001" and "P002" shall mean LUWA I and II, respectively, as listed in Condition C.3. of the Federally Enforceable Permit to Install and Operate, P0094783, the Ohio Environmental Protection Agency issued to CSI on August 16, 2011.

8. The term "VOC" shall mean volatile organic compound.

9. The term "TOC" shall mean total organic compound.

10. The term "HAP" shall mean hazardous air pollutant.

11. The term "or" shall mean and/or.

12. The singular form of a noun or pronoun shall be considered to include within its meaning the plural form of the noun or pronoun used, and vice versa; similarly, the use of any tense of a verb shall be construed to also include within its meaning all other tenses of the verb so used.

Appendix C

Chemical Solvents, Inc. (CSI) must submit the following information to EPA Region 5, pursuant to Section 114 of the Clean Air Act, 42 U.S.C. 7414, regarding its plant site in Cleveland, Ohio, within the scheduled time frame below:

1. Within 21 days of receipt of this request, CSI shall submit a testing protocol to conduct emission testing for TOCs including HAPs on the VRS condenser at the Dennison Avenue facility and the VRS at the Jennings Road facility, by measuring the inlet and outlet gas phase TOC and HAP concentrations of the VRS and gas phase volumetric flow rates in accordance with the following test methods from 40 C.F.R. Part 60, Appendix A:

   (A) Method 18 shall be used to determine TOC and HAP concentrations;

   (B) Method 1 or 1A shall be used for sample and velocity traverses. No traverse site selection method is needed for vents smaller than 0.10 meter in diameter;

   (C) Method 2, 2A, 2C, or 2D shall be used for velocity and volumetric flow rates;

   (D) Method 3 or 3A shall be used for gas analysis;

   (E) Method 3B shall be used to determine oxygen concentration;

   (F) Method 4 shall be used for stack gas moisture; and

   (G) Methods 2, 2A, 2C, or 2D, and 3 or 3A, 3B, and 4 shall be performed, as applicable, at least twice during each run at each sample point.

2. The emission testing shall include:

   (A) One compliance test (simultaneous measurement of inlet and outlet gas phase TOC concentrations and gas phase volumetric flow rates) for the Dennison VRS condenser and the Jennings VRS, consisting of three (3) separate runs, each lasting a minimum of sixty (60) minutes.

   (B) For each compliance test, either an integrated sample or a minimum of four grab samples shall be taken. If grab sampling is used, then the samples shall be taken at approximately equal intervals in time (e.g., 15 minute intervals during the run).

   (C) The process equipment and control equipment shall be operated in such a manner so as to produce representative samples of controlled and uncontrolled emissions.

   (D) The testing shall be performed at maximum (worst-case emissions) operating conditions including periods of steady and non-steady state operations at the P002 unit and all other equipment controlled by the Dennison VRS condenser and for all equipment controlled by the Jennings VRS. Maximum operating conditions at P002 shall include maintaining the unit's designed maximum material processing rate in tons per hour. If P001 is operating at Dennison, will be operated in the next six months, or has been operated in the last six months, it must also operate at maximum operating conditions. Maximum operating conditions for P001 and P002 combined shall include operating at a

rate of 3.75 tons of material processed per hour. Worst-case emissions operating conditions shall also include processing the highest concentration of TOC and HAP material with the lowest boiling point that can be processed in P001 (if applicable) and P002.

(E) The following parameters, at a minimum, shall be recorded during each run:

1. Product flow rate;
2. Pressure drop;
3. Recycle rate (% recycled or % wasted);
4. Flue gas flow rate (ACFM);
5. Dilution air (ACFM) and dilution air inlet location in reference to sample points, if required;
6. Initial determination of the average TOC and HAP concentration of the off-site material being processed in P001 (if applicable) and P002;
7. Sample Relative Humidity;
8. Sample Temperature;
9. Condenser coolant fluid temperature at the VRS condenser inlet and outlet;
10. P001 (if applicable) and P002 maximum and average operating temperature; and
11. Total amount of material processed (gallons) in each unit, including P001 (if applicable), P002, J001, J002 and any other processes or tanks controlled by either the Dennison or Jennings VRS.

(F) Only routine control device and process equipment maintenance may be performed between the date that this request is received and the date of the stack test. Any maintenance that is performed must be documented in the test report.

3. At the Dennison Avenue facility, testing shall occur at a minimum of three separate sampling locations. The first sample port must be located in the P002 condensable gas outlet tube after the P002 condenser and before the vacuum pump. The second testing location shall be after all vent streams have been introduced to the tube containing all gases routed to the VRS condenser but before the VRS condenser. The third testing location must be in the outlet gas tube of the VRS condenser but before the carbon absorption containers. If P001 is operating, is going to be operated in the next six months, or has been operated in the last six months, a fourth testing location shall be after the P001 condenser but before the P001 vacuum pump.

4. At the Jennings Road facility, testing shall occur at two separate sampling sites. Sampling sites shall be located at the inlet and at the outlet of the VRS. The control device inlet sampling site shall be located after the final product recovery device. The location of the inlet sampling sites shall be selected to ensure that the measurement of total HAP concentration or TOC concentration, as applicable, includes all vent streams routed to the VRS.

5. The testing must be conducted under a protocol approved in advance by EPA and contain at minimum the information listed in Appendix D.

6. To allow adequate time for EPA and/or the Cleveland Division of Air Quality (CDAQ) to witness the test, CSI shall submit an intent to test notification for the emission testing to both EPA and the CDAQ along with the name of the person or entity conducting the testing at least 14 days prior to the planned test date(s). A shorter timeframe may be approved by EPA if it does not interfere with EPA witnessing the test.

7. The TOC and HAP emission testing shall be completed within thirty (30) days from the date that this request is received.

8. A complete report of the TOC and HAP emission testing shall be submitted within thirty (30) days from the date of testing. The report must include the following, at a minimum:

   (A) Summary of Results

      1. Results of the above described TOC and HAP emission testing, as well as the results of any other TOC and HAP emission test runs conducted on the in accordance with Paragraph 1 of this appendix;
      2. Process and control equipment data related to any determination of compliance; and
      3. Discussion of any test errors, both real and apparent.

   (B) Facility Operations

      1. Description of the process and control equipment;
      2. Process and control equipment flow diagrams;
      3. Capture system flow diagrams;
      4. Process parameter, material use and production data from process;
      5. Description of portions of process operation tested;
      6. Representativeness of process parameters, raw materials, and products;
      7. Description of portions of control equipment operation tested; and
      8. Representativeness of control equipment parameters, and collected materials;
      9. Values of the parameters listed above, in paragraph 2(E), which were recorded throughout each test; and
      10. Description of all maintenance performed on the control and/or process equipment associated with the Dennison and Jennings VRSs between the date of receipt of this request and the date of the TOC and HAP emissions testing.

(C) Sampling and Analytical Procedures

1. Sampling port locations(s) and dimensions of cross-sectional area;
2. Sampling point description;
3. Brief description of sampling procedures, including equipment and diagram;
4. Description of sampling procedures that deviated from any standard method;
5. Brief description of analytical procedures, including calibration; and
6. Description of analytical procedures that deviated from any standard method.

(D) Appendix

1. Complete results (expressed in pounds of TOC and HAP per hour) with example calculations;
2. Raw field data (original, not computer printouts);
3. Laboratory report, with signed chain-of-custody forms;
4. Calibration procedures and results;
5. Raw process and control equipment data, signed by plant representative;
6. Test log;
7. Project participants and titles; and
8. Related correspondence.

9. The following calculations shall be used to determine mass rate and percent reduction of TOCs and HAPs. The results of these equations shall be submitted in the testing report.

a. The mass rate of TOC (minus methane and ethane) and total HAP (E_i and E_o, respectively) shall be computed using the following equations:

$$E_i = K_2 \times Q_i \times \sum_{j=1}^{n} \left(C_{ij} \times M_{ij} \right)$$

$$E_o = K_2 \times Q_o \times \sum_{j=1}^{n} \left(C_{oj} \times M_{oj} \right)$$

Where:

C_{ij} , C_{oj} = Concentration of sample component j of the gas stream at the inlet and outlet of the control device, respectively, dry basis, parts per million by volume.

E_i , E_o = Mass rate of TOC (minus methane and ethane) or total HAP at the inlet and outlet of the control device, respectively, dry basis, kilogram per hour.

M_{ij} , M_{oj} = Molecular weight of sample component j of the gas stream at the inlet and outlet of the control device, respectively, gram/gram-mole.

Q_i , Q_o = Flow rate of gas stream at the inlet and outlet of the control device, respectively, dry standard cubic meter per minute.

K_2 = Constant, 2.494×10^{-6} (parts per million)$^{-1}$ (gram-mole per standard cubic meter) (kilogram/gram) (minute/hour), where standard temperature (gram-mole per standard cubic meter) is 20 °C.

b. The percent reduction in TOC (minus methane and ethane) and total HAP shall be calculated as follows:

$$R_{cd} = \frac{E_i - E_o}{E_i} \times 100$$

where:

R_{cd} = Control efficiency of control device, percent.

E_i = Mass rate of TOC (minus methane and ethane) or total HAP at the inlet to the control device as calculated under paragraph (l)(3)(ii) of this section, kilograms TOC per hour or kilograms HAP per hour.

E_o = Mass rate of TOC (minus methane and ethane) or total HAP at the outlet of the control device, as calculated under paragraph (l)(3)(ii) of this section, kilograms TOC per hour or kilograms HAP per hour.

10. The total HAP concentration (C_{HAP}) at each sampling location must be computed according to the following equation. The results of this equation shall be submitted in the testing report.

$$C_{HAP} = \frac{\sum_{i=1}^{x}\left(\sum_{j=1}^{n} C_{ji}\right)}{X}$$

Where:

C_{HAP} = Total concentration of HAP compounds listed in Table 1 of this subpart, dry basis, parts per million by volume.

C_{ji} = Concentration of sample component j of the sample i, dry basis, parts per million by volume.

n = Number of components in the sample.

x = Number of samples in the sample run.

11. Provide documents supporting the design information, listed in Condition 3.b)(2)a. of the Federally Enforceable Permit to Install and Operate, P0094783, the Ohio Environmental Protection Agency issued to CSI on August 16, 2011, for the total heat exchanger surface areas of P001's and P002's water-cooled shell and tube condensers.

Appendix D

Minimum content of test protocol

General information:

A. Name and address of facility;
B. Name, title, telephone number, e-mail address and facsimile number of contact person at facility;
C. Schematic drawing(s) of stack(s), temporary enclosures and sample ports;
D. Location of plant;
E. Name, contact person, telephone number, e-mail address and facsimile number for testing company contracted to conduct the test; and
F. A process diagram(s) describing all pieces of equipment and bypasses. Diagram should include the flow of material through each process from raw material to finished product and should have all air pollution emission points identified by name.

Operating conditions:

A. List of the process or operating rate and conditions of the process equipment and air pollution control equipment being tested;
B. List of the range of process or operating rates for each emissions unit; and
C. Description of how air pollution control and process equipment will be monitored.

Methods:

A. List of the methods to be used to determine and demonstrate the accurate emission rate of each pollutant;
B. Number of test runs, length of test run, and sampling rate for each method;
C. Summary of any reasons for proposing to use any alternative or equivalent method; and
D. Description and explanation of what worst-case scenario is for CSI at both the Jennings Road and Dennison Avenue facilities. Provide documentation and supporting evidence.